



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

SEP 14 2007

AE-17J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Cedric Burroughs
Vice President Administration
Worzalla Publishing Company
3535 Jefferson Street
Stevens Point, Wisconsin 54481-4379

Re: Notice of Violation

Dear Mr. Burroughs:

This is to advise you that the United States Environmental Protection Agency (U.S. EPA) has determined that Worzalla Publishing Company (Worzalla) has violated the Clean Air Act (the "Act") and associated federal pollution control requirements at its printing plant (facility) located at 3535 Jefferson Street, Stevens Point, Wisconsin. A list of the requirements violated is provided below. We are today issuing to you a Notice of Violation (NOV) for these violations.

The Act requires the development of Primary and Secondary National Ambient Air Quality Standards to protect public health and welfare. To attain and maintain these standards, each State is required to develop a federally enforceable implementation plan. The facility's air pollution control construction permit, issued under the federally enforceable Wisconsin State Implementation Plan, prohibits particulate matter emissions greater than 3.0 pounds per hour from the Harris M120 Press when exhausting through stack S08. The purpose of such limits is to help protect the public from unhealthy exposures to particulate matter. Particulate matter, in particular fine particulate matter, contributes to respiratory problems, lung damage and premature deaths.

The U.S. EPA finds that Worzalla has violated the above listed federally enforceable permit condition. These violations constitute violations of the Act. Section 113 of the Act gives us several enforcement options to resolve these violations, including: issuing an administrative compliance order, issuing an administrative penalty order, bringing a judicial civil action, and bringing a judicial criminal action.

Section 113 of the Act provides you with the opportunity to request a conference with us about the violations identified in the attached NOV. This conference will provide you a chance to present information on the identified violations, any efforts you have taken to comply, and the

United States Environmental Protection Agency
Region 5

IN THE MATTER OF:)	
)	
Worzalla Publishing Company)	NOTICE OF VIOLATION
Stevens Point, Wisconsin)	
)	EPA-5-7-WI-12
)	
Proceedings Pursuant to)	
the Clean Air Act,)	
42 U.S.C. §§ 7401 et seq.)	
)	

NOTICE OF VIOLATION

Worzalla ("you" or "Worzalla") owns and operates a Harris M120 Heatset Press at its facility at 3535 Jefferson Street, Stevens Point, Wisconsin. The United States Environmental Protection Agency (U.S. EPA) is sending this Notice of Violation (NOV) to notify you of violations of the Wisconsin State Implementation Plan (Wisconsin SIP). A list and explanation of the violated requirements is provided below. The listed violations constitute violations of the Clean Air Act (the "Act").

Section 113 of the Act provides you with the opportunity to request a conference with us to discuss the violations alleged in the NOV. This conference will provide you a chance to present information on the identified violations, any efforts you have taken to comply, and the steps you will take to prevent future violations. Please plan for the facility's technical and management personnel to take part in these discussions. You may have an attorney represent and accompany you at this conference.

Explanation of Violations

The following regulatory and permit background, factual background, and violations are relevant to this NOV:

Permit and Regulatory Background

1. Wis. Admin. Code NR Chapter 406, "Construction Permits," was incorporated into the federally enforceable Wisconsin SIP at 60 *Fed. Reg.* 3543.

2. Wisconsin Department of Natural Resources (WDNR) issued an air pollution control permit to construct and operate modifications to the facility on November 9, 2005 (Permit 05-MHR-199) to the facility, under Wis. Admin. Code NR Chapter 406.

Factual Background

3. Worzalla owns and operates the facility at 3535 Jefferson Street, Stevens Point, Wisconsin. The facility includes a Harris M120 press.
4. Part I.C.2. of the permit limits emissions of particulate matter from the Harris Press to 3.0 pounds per hour through stack S08.
5. Worzalla provided the results of all stack tests conducted on the Harris Press and other emissions sources in the last three years in response to U.S. EPA's Information Request under Section 114 of the Clean Air Act, 42 U.S.C. § 7414, dated April 24, 2007.. This included a stack test report dated April 25, 2006.

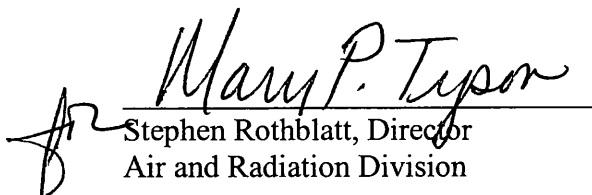
Violations

6. Based on the results of the stack test report provided by Worzalla, the Harris Press M120 emitted 8.88 pounds per hour, in excess of the 3.0 pound per hour permitted limit, on April 25, 2006. Worzalla violated the particulate matter limit in Part I.C.2 of its permit and the applicable Wisconsin SIP requirement specified in the construction permit.
7. The above-cited violation constitutes a violation of Section 110 of the CAA.

Environmental Impact of Violations

Violation of the particulate matter standards increases public exposure to unhealthy particulate matter. Particulate matter, especially fine particulate, contributes to respiratory problems, lung damage and premature deaths.

9/14/07
Date


Stephen Rothblatt, Director
Air and Radiation Division

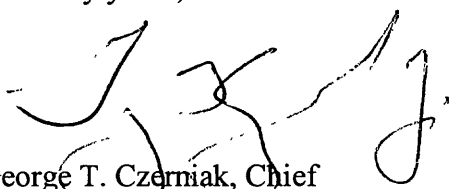
device, and establishing the alarm set points and the alarm delay time (if applicable);

- (5) Following the initial adjustment, do not adjust the sensitivity or range, averaging period, alarm set point, or alarm delay time without approval from the U.S.EPA;
 - (6) For negative pressure, induced air baghouses, and positive pressure baghouses that are discharged to the atmosphere through a stack, the bag leak detector sensor must be installed downstream of the baghouse;
 - (7) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors; and
- (b) For each baghouse subject to the opacity limit specified in 40 C.F.R. § 60.732 and your PSD permit # 06-POY-295 for the bag leak detection system alarm, you must maintain records of the times the bag leak detection system alarm sounded, and for each valid alarm, the time you initiated corrective action, the corrective action taken, and the date on which corrective action was completed.

U.S. EPA may require the use of another specified monitoring method, requirement, or procedure, if U.S. EPA finds reasonable grounds to dispute the results obtained under this alternative monitoring approval. This approval does not preclude Neenah's requirement to comply with any other State, local, or Federal monitoring requirements.

If you have any questions concerning this response, please contact Manoj Patel, of my staff, at (312) 353-3565.

Sincerely yours,



George T. Czerniak, Chief
Air Enforcement and Compliance Assurance Branch

cc: Jeffrey C. Henson, Chief
Permits and Stationary Source Modeling Section
Bureau of Air Management
Wisconsin Department of Natural Resources

Scott A. Throwe, OECA
USEPA Headquarters
Ariel Rios Building
1200 Pennsylvania Avenue, N. W.
Mail Code: 2223A
Washington, DC 20460

CERTIFICATE OF MAILING

I, Shanee Rucker, certify that I sent a Notice of Violation, No. EPA-5-7-WI-12, by Certified Mail, Return Receipt Requested, to:

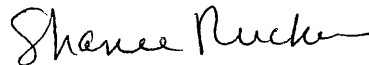
Cedric Burroughs
Vice President Administration
Worzalla Publishing Company
3535 Jefferson Street
Stevens Point, Wisconsin 54481-4379

I also certify that I sent copies of the Notice of Violation and Finding of Violation by first class mail to:

Thomas Woletz, Regional Leader
Wisconsin Department of Natural Resources
West Central Region
1300 W. Clairemont
P.O. Box 4001
Eau Claire, Wisconsin 54702-4001

Bill Baumann, Chief, Compliance and Enforcement Section
Wisconsin Department of Natural Resources
Bureau of Air Management
101 S. Webster Street
P.O. Box 7921 (AM/7)
Madison, Wisconsin 53702

on the 14th day of September, 2007.



Shanee Rucker, Secretary
AECAS (MI/WI)

CERTIFIED MAIL RECEIPT NUMBER: 7001 0320 0000 0186 2082